
Foreign Graduate Medical Schools

CHAPTER 3

In addition to the eligibility requirements discussed in Chapter 1 and Chapter 2, a foreign graduate medical school must comply with additional requirements to be eligible to participate in the Direct Loan Program.

GENERAL ELIGIBILITY CRITERIA

To be eligible to participate in the Direct Loan Program, a foreign graduate medical school must be either a freestanding foreign institution or a component of a foreign university that has as its sole mission the providing of an educational program that leads to a degree of medical doctor, doctor of osteopathic medicine, or the equivalent. Both public and private nonprofit and for-profit foreign graduate medical schools may participate in the Direct Loan Program.

A foreign graduate medical school is eligible to apply to participate in the Direct Loan Program if it:

- Meets the general eligibility and participation requirements for foreign institutions;
- Provides, and in the normal course requires its students to complete, a program of clinical training and classroom medical instruction of not less than 32 months in length, that is supervised closely by members of the school's faculty and that:
 - ◇ Is provided in facilities adequately equipped and staffed to afford students comprehensive clinical training and classroom medical instruction,
 - ◇ Is approved by all medical licensing boards and evaluating bodies whose views are considered relevant by the Department; and
 - ◇ As part of its clinical training, does not offer more than two electives consisting of no more than eight weeks per student at a site located in a foreign country other than the country in which the main campus is located or in the United States, unless that location is included in the accreditation of a medical program accredited by the Liaison Committee on Medical Education (LCME) or the American Osteopathic Association (AOA) (for more

Definition of a foreign graduate medical school

34 CFR 600.52, 600.55(a)(1)

General eligibility criteria

34 CFR 600.55(a)

Clinical training

34 CFR 600.52

Clinical training refers to the portion of a graduate medical education program that counts as a clinical clerkship for purposes of medical licensure and consists of core clinical training, required clinical rotations (the electives that students are required to take), and not required clinical rotations (the electives that students can choose).

information, see the discussion under *Location of the Program*);

- Appoints for the program only those faculty members whose academic credentials are the equivalent of credentials required of faculty members teaching the same or similar courses at medical schools in the United States;

Requirement to notify accrediting body

34 CFR 600.55(e)(2)

- Has graduated classes during each of the two twelve-month periods immediately preceding the date the Department receives the school's request for an eligibility determination;

- For a for-profit foreign graduate medical school:

- ◇ No portion of the program may be at what would be an undergraduate level in the United States; and
- ◇ Direct Loan program eligibility does not extend to any undergraduate/graduate joint degree program.

Publication of instruction language

34 CFR 600.55(g)(3)

For-profit foreign graduate medical school

34 CFR 600.54(f)

- Notifies its accrediting body within one year of any material changes in:

- ◇ The educational programs, including changes in clinical training programs, and
- ◇ The overseeing bodies and in the formal affiliation agreements with hospitals and clinics (for more information, see the discussion under *Requirements for Clinical Training*);

- Publishes all the languages in which instruction is offered.

ACCREDITATION

A foreign graduate medical school must be approved by an accrediting body:

- That is legally authorized to evaluate the quality of graduate medical school educational programs and facilities in the country where the school is located, and
- Whose standards of accreditation of graduate medical schools have been evaluated by the National Committee on Foreign Medical Education and Accreditation (NCFMEA) and have been determined to be comparable to standards of accreditation applied to medical schools in the United States.

The NCFMEA is a committee of medical experts established by the Department to determine whether the medical school accrediting standards used in other countries are comparable to those applied to medical schools in the United States for purposes of evaluating the eligibility of accredited foreign graduate medical schools to participate in Direct Loan Program. The NCFMEA does not review or accredit individual foreign graduate medical schools.

The request by a foreign country for review is voluntary.

The countries that have been reviewed by the NCFMEA and found to use standards to accredit their medical schools that are comparable to the standards used to accredit medical schools in the United States, as well as additional information on the NCFMEA, can be found at <http://www2.ed.gov/about/bdscomm/list/ncfmea.html>.

ADMISSION CRITERIA

A foreign graduate medical school having a post-baccalaureate/ equivalent medical program must require students accepted for admission who are U.S. citizens, nationals, or permanent residents to have taken the Medical College Admission Test (MCAT) and to have reported their scores to the foreign graduate medical school. Foreign graduate medical schools are not required to give weight to a U.S. student's score on the MCAT as part of its admission requirements. Schools are required to submit MCAT scores for U.S. students to its accrediting body, and to the Department upon request (see *Collection and Submission of Data*).

A post-baccalaureate/ equivalent medical program is a program offered by a foreign graduate medical school that requires, as a condition of admission, that its students have already completed their non-medical undergraduate studies and that consists solely of courses and training leading to employment as a doctor of medicine or doctor of osteopathic medicine.

In addition, a foreign graduate medical school must determine and require the necessary consents of all students accepted for admission for whom the school must report certain data in accordance with the collection and submission requirements described under *Collection and Submission of Data*.

Accreditation

34 CFR 600.55(b)

Definition of NCFMEA

34 CFR 600.52

U.S. citizen, national, or permanent resident

A person is a U.S. citizen by birth or by naturalization or by operation of law. Persons (except for the children of foreign diplomatic staff) born in the 50 states, the District of Columbia, and, in most cases, Puerto Rico, the U.S. Virgin Islands, Guam, and the Northern Mariana Islands are U.S. citizens, as are most persons born abroad to parents (or a parent) who are citizens. All U.S. citizens are considered U.S. nationals, but not all nationals are citizens. Persons whose only connection to the United States is through birth on American Samoa, Swains Island, or the U.S. Minor Outlying Islands are not U.S. citizens but are nationals. Permanent residents are noncitizens who are legally permitted to live and work in the U.S. permanently. For more information, see the FSA Handbook, Volume 1, Chapter 2.

USMLE Pass Rate Requirement

34 CFR 600.55(f)(1)(ii), (f)(2), (f)(3), and (f)(4)

Passing score

34 CFR 600.52

A passing score is the minimum passing score as defined by the ECFMG.

USMLE PASS RATE REQUIREMENT

Unless exempt under the law, all foreign graduate medical schools must have annually at least a 75 percent pass rate on each step/test of the United States Medical Licensing Exam (USMLE) administered by the Educational Commission for Foreign Medical Graduates (ECFMG), including Step 1, Step 2-Clinical Knowledge (Step 2-CK), and Step 2-Clinical Skills (Step 2-CS).

The USMLE is the three-step examination for medical licensure in the U.S. that provides a comprehensive assessment of an individual's medical knowledge and skills. Step 1 assesses knowledge and application of basic science concepts; Step 2-CK tests an individual's ability to examine and interact with patients and colleagues; Step 2-CS assesses knowledge of clinical science principles; and Step 3 provides a final assessment of an individual's ability to assume independent delivery of general medical care.

Graduates of medical schools located outside of the U.S. and Canada must pass Step 1, Step 2-CK, and Step 2-CS to obtain certification from the ECFMG. ECFMG certification is required before a graduate of a medical school outside of the U.S. and Canada may apply to take Step 3 of the USMLE. ECFMG certification is also required to enter a medical residency program accredited by the Accreditation Council for Graduate Medical Education and to obtain an unrestricted license to practice medicine in the United States.

Schools meet this requirement if at least 75 percent of the school's students and graduates who took a step/test for the first time in the year preceding the reporting year received a passing score on the step/test. A graduate is a student who graduated from the school during the three years preceding the reporting year. For example, the pass rate that must be submitted to the Department in 2015 for Step 1 is determined as follows:

Students from the denominator who passed Step 1

All students at the school in calendar year 2014 and all students who graduated in 2012, 2013, and 2014, who took Step 1 for the first time during calendar year 2014

If the result of any step/test pass rate is based on fewer than eight students, a single pass rate is determined for the school based on the performance of students and graduates on Step 1, Step 2- CS and Step 2-CK combined. If that combined pass rate is based on fewer than eight step/test results, the school is considered to have no pass rate for that year, and the results for the year are combined with each subsequent year until a pass rate based on at least eight step/test results can be derived. An otherwise eligible foreign graduate medical school maintains its eligibility for years for which it is considered to have no pass rate.

Pass rate scores must be submitted to the Department by April 30 of each year. For information on the submission of pass rate scores, see *Collection and Submission of Data*.

Schools that lose eligibility on this basis may reapply for participation in the Direct Loan Program after one year, if they can establish compliance with the pass rate requirement.

Exemptions

The law exempts from the USMLE pass rate requirement foreign graduate medical schools located in Canada and foreign graduate medical schools that have a clinical training program that was approved by a State as of January 1, 1992, and that continue to operate a clinical training program in at least one State that approves the program.

CITIZENSHIP RATE REQUIREMENT

The citizenship rate requirement provides that foreign graduate medical schools are not eligible to participate in the Direct Loan Program unless, in the preceding year, at least 60 percent of the school's full-time students and at least 60 percent of the school's most recent graduating class were persons who were neither U.S. citizens, nationals, nor permanent residents.

So, foreign graduate medical schools must compute two citizenship rates: (1) for students who were enrolled, but did not graduate, during the preceding calendar year, and (2) for individuals who did graduate during the preceding calendar year.

For the first rate, the foreign graduate medical school must include in the denominator all students who were enrolled as full-time students in the foreign graduate medical school at any time during the most recently completed calendar year, excluding students who graduated during that year. For the second rate, the foreign graduate medical school should include in the denominator all students who graduated during the most recently completed year. The school must include only those students enrolled in, or graduating from, educational programs intended to result in licensure to practice medicine.

In computing the numerators of both rates, the foreign graduate medical school must include only students or graduates, as applicable, who are neither U.S. citizens, nationals, nor permanent residents. The foreign medical school must exclude from the numerator at least:

- any students or graduates, as applicable, who were included in the denominator but who received Federal Family Education Loan Program loans or Direct Loans at any time during their enrollment;
- any students or graduates, as applicable, included in the denominator who applied for FSA Program funds in connection with their enrollment and were not found ineligible based on FSA Program citizenship requirements;
- any students or graduates, as applicable, included in the denominator who provided documentation to the school, such as a passport or visa, indicating that he or she was a U.S. citizen or national or other eligible non-citizen; and

Citizenship pass rate requirement

34 CFR 600.55(f)(1)(i)

- any students or graduates, if applicable, included in the denominators if information provided by the student or graduate to the school indicates that he or she was residing in the United States or its territories at the time of application for admission or between terms, absent documentation indicating that the student or graduate is neither a U.S. citizen or national, nor an otherwise eligible (i.e., permanent resident) noncitizen.

For example, the citizenship pass rates that must be submitted to the Department in 2015 are determined as follows:

Full-time student rate:

2014 full-time students who did not graduate in 2014 and were neither
U.S. citizens, nationals, nor permanent residents

Any student enrolled full time during 2014 who did not
graduate in 2014

Graduates rate:

2014 graduates who did not graduate in 2014 and were neither U.S.
citizens, nationals, nor permanent residents

Any student who graduated in 2014

Schools that lose eligibility on this basis may reapply for participation in the Direct Loan Program after one year, if they can establish compliance with the citizenship requirement.

Foreign graduate medical schools that have a clinical training program that was approved by a State prior to January 1, 2008 and that continue to operate a clinical program in at least one State that approves the program are exempt from the citizenship rate requirement.

COLLECTION AND SUBMISSION OF DATA

Foreign graduate medical schools are required to report on various aspects of their programs to improve the information available to students, and to inform future discussions regarding improvements that can be made to the law governing the participation of foreign graduate medical schools in the Direct Loan Program.

A foreign graduate medical school must obtain at its own expense and submit data to the Department on:

- Pass rates on the USMLE,
- Citizenship rates,
- Completion rates, and
- Median and mean student debt level.

A foreign graduate medical school must obtain at its own expense and submit data to its accrediting body, and to the Department upon request, on:

- MCAT scores, and
- Placements in U.S. residency medical programs.

Foreign graduate medical schools must submit this information by April 30 following the end of each calendar year.

The Department publishes the USMLE pass rates, completion rates, and median and mean student debt level information for participating foreign graduate medical schools at <https://studentaid.ed.gov/prepare-for-college/choosing-schools/types/international>. To protect the privacy of students, the Department does not publish information about a foreign graduate medical school if the number of students used in the relevant calculation is fewer than eight.

USMLE pass rates and citizenship rates

All foreign graduate medical schools, even those that are exempt from the USMLE pass rate requirement (discussed previously in this chapter), must submit to the Department all USMLE scores, disaggregated by step/test and attempt, earned during the preceding calendar year by each student and graduate, on Step 1, Step 2-CK, and Step 2-CS of the USMLE, together with the dates the student took each test, including any failed tests.

In addition, all foreign graduate medical schools that must meet the citizenship pass rate requirement (see *Citizenship Pass Rate Requirement*) must submit to the Department a statement of its citizenship rate for the preceding calendar year.

A school may obtain USMLE scores from the ECFMG by submitting Form 173, Institutional Request for an Official USMLE® Transcript, available at <http://www.ecfmg.org/forms/transcripts.html>

Address for submitting citizenship rates

U.S. Department of Education, FSA
Foreign Schools Participation Division
830 First Street, NE, Room 73C3
Washington, DC 20202-5402

Alternate means of submission

Although the regulations provide for the submission of USMLE pass rates directly from the ECFMG to the Department under some circumstances, this option is not currently available. 34 CFR 600.55(d)(2).

USMLE exam results must be accompanied by a transmittal letter on the institution's letterhead that is signed by the official responsible for signing the Program Participation Agreement for the foreign graduate medical school's participation in the Direct Loan Program. The transmittal letter should contain the school's computation of its USMLE pass rates. For information on how to calculate USMLE pass rates, see *USMLE Pass Rate Requirement*.

Likewise, citizenship rates are to be provided to the Department by the foreign graduate medical school in writing on the institution's letterhead and signed by the official responsible for signing the Program Participation Agreement for the foreign graduate medical school's participation in the Direct Loan Program. The transmittal letter should describe the computation of the two citizenship rates (see sidebar for address).

MCAT scores and placement in U.S. residency medical programs

Foreign graduate medical schools must collect and submit to their accrediting bodies, and to the Department upon request, MCAT scores, including the number of times a student took the examination, for all students admitted during the preceding calendar year who are U.S. citizens, nationals or eligible permanent residents. A foreign graduate medical school is required to have U.S. students report only one MCAT score; they are not required to collect scores for each time a student took the MCAT.

Foreign graduate medical schools are also required to collect and submit to their accrediting bodies, and to the Department upon request, placements in U.S. residency medical programs for students graduating during the preceding calendar year, including at least all graduates who are U.S. citizens, nationals or eligible permanent residents.

Completion rates and median and mean student debt level

Foreign graduate medical schools must report completion rates and median and mean student debt levels for students. Foreign graduate medical schools must submit, on an educational program by program basis, the data described below, to the Department by the April 30 following the end of each calendar year, starting with April 30, 2013:

- The on-time completion rate for U.S. students completing the medical program in the previous calendar year (e.g., calendar year 2014 for the April 30, 2015, submittal), where a student will be considered to have completed the medical program "on-time" if the student completes all requirements for the degree within the time specified in the institution's catalog or on its web site;
- The median and mean FSA loan program debt, the median and mean private educational loan debt, the median and mean institutional education loan debt, and the median and mean combined educational loan debt incurred by U.S. students who completed the program in the previous calendar year. These medians and means should include only the debt incurred by the students for attendance in the medical program.

For the purposes of the median and mean FSA loan program debt reporting requirements, all loans provided under the Direct Loan Program and the Federal Family Education Loan (FFEL) Program are to be included

in the calculation of loan debt.

For the private educational loan median and mean loan debt, a private education loan means an extension of credit that:

- Is not made, insured, or guaranteed under title IV of the Higher Education Act of 1965;
- Is extended to a consumer expressly, in whole or in part, for postsecondary educational expenses, regardless of whether the loan is provided by the educational institution that the student attends;
- Does not include open-end credit or any loan that is secured by real property or a dwelling; and
- Does not include an extension of credit in which the covered educational institution is the creditor if the term of the extension of credit is 90 days or less, or an interest rate will not be applied to the credit balance and the term of the extension of credit is one year or less (even if the credit is payable in more than four installments).

Examples of private education loans include, but are not limited to, loans made expressly for educational expenses by financial institutions, credit unions, institutions of higher education or their affiliates, and States and localities.

For the median and mean institutional education loan debt, institutions must include any loan (other than a Direct Loan, FFEL program loan, or a loan that would be considered a private education loan), extension of credit, payment plan, or other financing mechanism that results in a debt obligation that a student must pay to an institution after completing the program and that is outstanding at the time that the student completes the program.

For the median and mean combined education loan debt, the combined education loan debt includes all loans provided under the Direct Loan and FFEL Programs, private education loans, as defined above, and institutional education loan debt, as defined above.

REQUIREMENTS FOR CLINICAL TRAINING

A foreign graduate medical school must have a formal affiliation agreement with any hospital or clinic at which all or a portion of the school's core clinical training or required clinical rotations are provided.

For any hospital or clinic at which all or a portion of its clinical rotations that are not required are provided, a foreign graduate medical school must have either a formal affiliation agreement or other written arrangements with the hospital or clinic, except for those locations that are not used regularly, but instead are chosen by individual students who take no more than two electives at the location for no more than a total of eight weeks.

To ensure continuity of the eligible program from the main campus to remote locations, the formal affiliation agreements and written arrangements

Completion rates and median and mean student debt level

Dear Colleague Letter GEN-12-20, November 7, 2012

Authority for collection

Institutions that participate in the FSA programs must submit reports to the Department containing such information as the Department may reasonably require to carry out the purposes of the FSA programs. 34 CFR 668.14(b)(7)

Requirements for clinical training

34 CFR 600.55(e)

Definition of a private education loan

The Truth-in-Lending regulations, 12 CFR 226.46(b)(5)

must state how the following will be addressed at each site:

- Maintenance of the school's standards,
- Appointment of faculty to the medical school staff,
- Design of the curriculum,
- Supervision of students,
- Evaluation of student performance, and
- Provision of liability insurance.

As mentioned previously, a foreign graduate medical school must notify its accrediting body within one year of any material changes in the educational programs, including changes in clinical training programs, in the overseeing bodies, and in the formal affiliation agreements with hospitals and clinics.

LOCATION OF THE PROGRAM

A foreign graduate medical program offered to U.S. students—

- Must be located in the country in which the main campus of the school is located, except for the clinical training portion of the program, and
- Must be in a country whose medical school accrediting standards are comparable to U.S. standards as determined by the NCFMEA, except for exempt clinical training sites (see box), or clinical sites located in the U.S. (which, of course, are subject to U.S. standards).

Unless a clinical training site is an exempt clinical training site, for students to be eligible to receive Direct Loan funds at any part of the clinical training portion of the program located in a foreign country other than country where the main campus of the foreign graduate medical school is located or in the U.S.:

- The school's medical accrediting agency must have conducted on-site evaluation and approved the clinical training site, and
- The clinical instruction must be offered in conjunction with programs offered to students enrolled in accredited schools located in that approved foreign country.

Location of the program

34 CFR 600.55(h)

Clinical training

34 CFR 600.52

The portion of a graduate medical education program that counts as a clinical clerkship for purposes of medical licensure comprising core, required clinical rotation, and not required clinical rotation.

Exempt Clinical Training Sites

- The location of the clinical training site is included in the accreditation of a medical program accredited by the Liaison Committee on Medical Education (LCME) or the American Osteopathic Association (AOA), **OR**
- No individual student takes more than two electives at the location and the combined length of the electives does not exceed eight weeks.

SATISFACTORY ACADEMIC PROGRESS

To be eligible for FSA program funds, a student must make satisfactory academic progress, and institutions must have a reasonable policy for monitoring that progress. The Department considers an institution's satisfactory academic progress policy to be reasonable if it meets both the qualitative and quantitative criteria required by FSA program regulations.

An institution's satisfactory academic progress policy must specify the quantitative standard (pace) at which students must progress through their program to ensure that they will graduate within the maximum timeframe, and each academic progress check must measure this.

While for most graduate programs the institution defines the maximum timeframe for completion of the program, at a foreign graduate medical school, the maximum timeframe in which a student must complete his or her educational program must be no longer than 150 percent of the published length of the educational program measured in academic years, terms, credit hours attempted, clock hours completed, etc., as appropriate.

For additional information on satisfactory academic progress, including qualitative criteria, how an institution calculates the pace at which the student is progressing, how often an institution must evaluate a student's progress, and the treatment of course incompletes, withdrawals, repetitions, or transfers of credit from other institutions see the *FSA Handbook*, Volume 1, Chapter 1.

A foreign graduate medical school must document the educational remediation it provides to assist students in making satisfactory academic progress.

APPLICATION INFORMATION

A foreign graduate medical school (again, meaning a freestanding foreign graduate medical school or a foreign institution that includes a graduate medical school) that applies or reapplies to participate in the Direct Loan Program must provide certain information in addition to the information required of all institutions.

For initial certification or for recertification, a foreign graduate medical school is required to:

- Indicate whether it offers only post-baccalaureate/equivalent medical programs, other types of programs that lead to employment as a doctor of osteopathic medicine, doctor of medicine, or both, so that the Department may track and enforce provisions specific to post-baccalaureate/equivalent medical programs,
- List on the application all educational sites and where they are located, except for those locations that are not used regularly, but instead are chosen by individual students who take no more than two electives at the location for no more than a total of eight weeks,

SAP at foreign graduate medical schools

34 CFR 600.55(g)(1) and (2)

Application information

34 CFR 600.20(a)(3), 600.20 (b)(3), 600.20 (c)(5) and 600.21(a)(10)

- For each clinical site, identify the type of clinical training (core, required clinical rotation, not required clinical rotation) offered at that site, and
- Provide copies of the affiliation agreements with hospitals and clinics that it is required to have to participate in the Direct Loan Program (see *Requirements for Clinical Training*).

When a foreign graduate medical school adds a location that offers all or a portion of the school's core clinical training or required clinical rotations and wishes to provide Direct Loan Program funds to the students at that location, the school must apply and wait for approval from the Department before disbursing Direct Loan Program funds, except for those locations that are included in the accreditation of a medical program accredited by the LCME and the AOA.

When a foreign graduate medical school adds a location that offers all or a portion of the school's clinical rotations that are not required, and wishes to provide Direct Loan Program funds to the students at that location, the school must notify the Department no later than 10 days after the location is added, except for those locations that are included in the accreditation of a medical program accredited by the LCME, the AOA, or those locations that are not used regularly, but instead are chosen by individual students who take no more than two electives at the location for no more than a combined total of eight weeks.